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March 3, 2021

BY ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application granted.
SO ORDERED

	<u>/s/ John G. Koeltl</u>
March 4, 2021	John G. Koeltl
New York, NY	U.S.D.J.

Re: *United States v. Jameel Alsaedi*, No. 19 Cr. 560 (JGK)

Dear Judge Koeltl:

I write on behalf of Jameel Alsaedi to request a modification of the conditions of his release so that he may move back in with his pregnant wife and his children, who live ten minutes away from Mr. Alsaedi's current residence. This request comes at the urging of Pretrial Services Officer Joshua Rothman, who believes the requested modification to be reasonable. I have also conferred with counsel for the government Robert Sobelman, who defers to Pretrial Services.

On October 1, 2020, the Court ordered Mr. Alsaedi's release upon the following conditions of bail:

A \$400,000 personal recognizance bond, secured by \$200,000 in real property and by the following co-signers: Gamal Alsaedi, the defendant's father; Haleem Alzandani, the defendant's brother-in-law; Kamal Alsaedi, the defendant's brother; Fikri Mohamed, the defendant's uncle; and Nuel Alsaedi, the defendant's wife. The defendant shall be subject to location monitoring and home detention, at the residence of the defendant's father, Mr. Gamal Alsaedi. Additional conditions shall include psychiatric treatment at an outpatient facility. The defendant's father shall guarantee the defendant's appearance in Court and at all psychiatric appointments.

ECF No. 49.

Since his release, Mr. Alsaedi has been under regular psychiatric care, which has been successful in treating his panic and anxiety disorder and has brought Mr. Alsaedi a great measure of relief. Mr. Alsaedi's wife Nuel is pregnant with their third child. Nuel is without childcare for the other young children – aged one and four. Mr. Alsaedi's assistance is necessary, and he is currently unable to offer it because he is on home detention.

Hon. John G. Koeltl

March 3, 2021

Page 2 of 2

Gamal Alsaedi understands that he must still guarantee his son's appearance in Court and at psychiatric appointments. Mr. Alsaedi's apartment is approximately a ten-minute drive from Gamal's home. Mr. Alsaedi has made great strides under psychiatric care, and his wife needs help caring for the children. Accordingly, Mr. Alsaedi respectfully asks the Court to modify the conditions of release so that he may relocate to 1114 Rhineland Avenue, Bronx, New York, the home he shares with Nuel.

Respectfully submitted,

/s/ Ezra Spilke

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Counsel for Jameel Alsaedi

cc: All counsel of record